[PROPOSED] ORDER GRANTING ADMINISTRATIVE MOTION TO SEAL

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Court's Ruling on

Motion to Seal

GRANTED as to

5:22

redacted portions at:

Pages 5:8-9, 5:13, 5:19,

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[PROPOSED] ORDER

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Before the Court is the Joint Submission regarding sealing portions of The Court's September 26, 2022 Order on Plaintiffs' Renewed Request to Depose Sundar Pichai (Dkt. 758).

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Having considered the Joint Submission, supporting declaration, and other papers on file, and good cause having been found, the Court **ORDERS** as follows:

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Document

Order on Plaintiffs'

Renewed Request to

Depose Sundar Pichai

September

26, 2022

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SO ORDERED.

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DATED: October 4, 2022

THE HONORABLE SUSAN VAN

THE HÖNORABLE SUŠAN VAN KEULEN United States Magistrate Judge

relating to competing products.

Reason(s) for Court's Ruling

systems and

Google's

The information requested to be sealed

contains Google's highly confidential and

proprietary information regarding highly

sensitive features of Google's internal

Google's internal projects and their proprietary functionalities, that Google

maintains as confidential in the ordinary course of its business and is not generally

known to the public or Google's competitors. Such confidential and

proprietary information reveals Google's

internal strategies, system designs, and business practices for operating and

maintaining many of its important services, and falls within the protected

scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public

disclosure of such confidential and

proprietary information could affect

competitors may alter their systems and practices relating to competing products.

It may also place Google at an increased risk of cybersecurity threats, as third

parties may seek to use the information to

compromise Google's internal practices

competitive

operations, including

standing

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Case No. 4:20-cv-03664-YGR-SVK